

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

VSTREAM TECHNOLOGIES, LLC,

Plaintiff,

v.

PLR IP HOLDINGS LLC, PLR
ECOMMERCE LLC, PLR BRAND
SERVICES LLC; C&A IP HOLDINGS LLC,
C&A MARKETING INC., C&A
LICENSING LLC; DRIFT INNOVATION
INC., DRIFT INNOVATION LTD.; AND
CONTOUR LLC,

Civil Action No. 6:15-cv-00974-JRG-JDL

***Consolidated with Civil Action Nos. 6:15-
cv-976 and 6:15-cv-977***

**STIPULATED MOTION FOR
DISMISSAL WITH PREJUDICE**

VSTREAM TECHNOLOGIES, LLC

Plaintiff,

v.

MOTOROLA MOBILITY LLC,
BLACKBERRY LTD., BLACKBERRY
CORP

VSTREAM TECHNOLOGIES, LLC

Plaintiff,

v.

RICOH IMAGING AMERICAS
CORPORATION, RICOH AMERICAS
CORPORATION, RICOH USA INC.,
RICOH IMAGING COMPANY LTD., AND
RICOH COMPANY LTD.,
Defendants.

STIPULATED MOTION FOR DISMISSAL WITH PREJUDICE

Plaintiff DBEZ Firenze LLC and Defendant Motorola Mobility LLC (“Defendant”), pursuant to Fed. R. Civ. P. 41(a)(2), hereby jointly move for an order dismissing all claims asserted by Plaintiff DBEZ Firenze LLC against Defendant WITH PREJUDICE, dismissing Defendant’s claims for declaration of non-infringement against Plaintiff DBEX Firenze LLD WITH PREJUDICE and dismissing Defendant’s claims for declaration of invalidity WITH PREJUDICE with each party to bear its own costs, expenses and attorneys’ fees.

Dated: February 21, 2017

Respectfully submitted,

/s/ Jonathan E. Retsky
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**ATTORNEY FOR DEFENDANT
MOTOROLA MOBILITY LLC**

Respectfully submitted:

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**ATTORNEY FOR PLAINTIFF
DBEZ FIRENZE LLC**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on February 21, 2017.

/s/ Jonathan E. Retsky